2024 May-30 PM 12:31 U.S. DISTRICT COURT

N.D. OF ALABAMA

EXHIBIT 12

SWORN STATEMENT OF ROSS ROBERTSON

- 1. My name is Ross Robertson. I am over the age of 21 and have personal knowledge of the contents of this statement.
- 2. Prior to joining CRC, I had obtained a degree in finance from Ole Miss and had about a year and a half of experience in sales.
- 3. I was hired as an account executive in early 2018. As an account executive, I did loss runs, obtained quotes, issued binders, and other administrative support tasks necessary to selling insurance policies. After working as an account executive for about three years, I moved to an inside broker position on Rusty Hughes and Tyler O'Connor's team.
- 4. When I joined CRC, I expressed an interest in becoming a revenue producing broker. I was not surprised when O'Connor and Hughes approached me about being an inside broker since we had discussed it previously.
- 5. When I became an inside broker, I did not have account executive duties taken away. I was not assigned an assistant to help me with paperwork. I continued to perform these same tasks while also developing business.
- 6. I did not have anyone assigned to help me with administrative tasks until after I had been an inside broker for close to a year and half. At that point, the team hired Logan Sanderson as an account executive. Initially, she helped the entire team and so I continued to perform many of the administrative tasks on our book of business. I still perform administrative tasks on my and O'Connor's accounts as needed. It was not until the end of 2022 that Sanderson has focused more on assisting O'Connor's renewal book and new business with me.
- 7. I started traveling more since becoming an inside broker. At present, I usually travel out of town at least twice of month to call on existing or prospective clients.

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8. Beginning around the fall to end of 2023, some of the accounts I had been working

were shifted and disbursed to other team members. This shift is due to me developing new

business. However, Sanderson and I still manage a large portion of O'Connor's renewal book.

9. I am not aware of anyone in CRC Birmingham's Professional Liability Department

who, within the first 2 years of becoming an inside or associate broker, stopped all or even most

binding, marketing, and quoting duties to focus solely on generating business.

10. I still service accounts as well as work to grow O'Connor's book from existing

relationships. Everyone on our teams handles tasks as needed especially when someone is out of

the office or traveling. As an inside broker I still do loss runs, quotes, and binders.

11. I sat in a cubicle until our office finished renovations a couple years ago which

provided more offices.

12. I recall texting with other brokers to coordinate when traveling. I do not recall any

events or other business information shared via text. I received this kind of information by email.

13. I have never worked on Corey Daugherty's team. Every broker team within the

CRC Professional Liability department is different. Some teams are bigger than others based on

their book of business revenue. As a result, some teams have more inside brokers and account

executives to handle the work. The types of coverages a team sells also may vary and some brokers

specialize in certain types of coverage. The team I work on is the biggest in the Professional

Liability department. Every team handles client relationships and work distribution differently.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 5/7/24